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[Additional counsel listed on signature page]

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SCOTT STERLING, individually and on behalf of all others similarly situated, Plaintiff, v. IRIS ENERGY LIMITED, DANIEL ROBERTS, WILLIAM ROBERTS, DAVID BARTHOLOMEW, CHRISTOPHER GUZOWSKI, MICHAEL ALFRED, J.P. MORGAN SECURITIES LLC, CANACCORD GENUITY LLC, CITIGROUP GLOBAL MARKETS INC., CANTOR FITZGERALD & CO., GALAXY DIGITAL PARTNERS LLC, COMPASS POINT RESEARCH & TRADING, LLC, and MACQUARIE CAPITAL (USA) INC., Defendants.	No. 2:22-cv-7273 *Document Filed Electronically* <u>CLASS ACTION</u> **ORAL ARGUMENT REQUESTED** **RETURN DATE:** December 4, 2023 <u>**NOTICE OF MOTION TO DISMISS**</u>

To: Peter S. Pearlman   Francis A. Bottini, Jr. (*pro hac vice* forthcoming)
       Matthew F. Gately   Albert Y. Chang (*pro hac vice* forthcoming)
       COHN LIFLAND PEARLMAN   **BOTTINI & BOTTINI, INC.**
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       250 Pehle Avenue, Suite 401   La Jolla, California 92037
       Saddle Brook, New Jersey 07663

Counsel for Lead Plaintiffs and Liaison   *Lead Counsel for Lead Plaintiffs*
Counsel

   PLEASE TAKE NOTICE that on December 4, 2023, or such other

time and date as set by the Court, Defendants Iris Energy Limited, Daniel

Roberts, William Roberts, David Bartholomew, Christopher Guzowski,

Michael Alfred, J.P. Morgan Securities LLC, Canaccord Genuity LLC,

Citigroup Global Markets Inc., Cantor Fitzgerald & Co., Galaxy Digital

Partners LLC, Compass Point Research & Trading, LLC, and Macquarie

Capital (USA) Inc. will move before the Honorable Judge John Michael

Vazquez, Judge of the United States District Court for the District of New

Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street,

Newark, New Jersey, for entry of an Order granting Defendants' Motion to

Dismiss Plaintiffs' First Amended Complaint.

   PLEASE TAKE FURTHER NOTICE that, in support of the

within motion, Defendants rely upon the accompanying Memorandum of

Law in Support of Defendants' Motion to Dismiss and the Declaration of

Edmund Polubinski III.

PLEASE TAKE FURTHER NOTICE that a proposed form of

Order is being submitted herewith.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local

Civil Rule 78.1(b), Defendants request oral argument on this motion.

Dated: August 4, 2023

GIBBONS P.C.

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LOCAL RULE 11.2 CERTIFICATION

Pursuant to Local Rule 11.2, I hereby certify that, to the best of my knowledge, the matter in controversy in this case is not the subject of any other action pending in any court, or of any pending arbitration or administrative proceeding. I am aware that if the foregoing is willfully false I am subject to punishment.

Dated: August 4, 2023   _s/ Samuel I. Portnoy_____
                                                                            Samuel I. Portnoy